



February 6, 2024

**VIA ECF**

Hon. Arun Subramanian  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

SO ORDERED.

A handwritten signature in black ink, appearing to read 'Arun Subramanian'.

Arun Subramanian, U.S.D.J.

Date: February 6, 2024

Re: *G.L., et al., v. N.Y.C. Dep't of Educ. et al.*, 23-CV-09395 (AS)

Dear Judge Subramanian,

We represent Defendants in the above-referenced action, wherein Plaintiff seeks attorneys' fees, costs and expenses for legal work on an administrative hearing under the Individuals with Disabilities Education Act, 20 U.S.C. §1400, *et seq.* ("IDEA"), as well as for this action.

Defendants write, with Plaintiff's consent, pursuant to Your Honor's Order dated February 2, 2024. [Dkt. No. 11]. We respectfully request that the Court adjourn the Initial Conference currently scheduled for February 7, 2024 *sine die*. In addition, pursuant to the Court's Individual Practices, we attach a proposed Civil Case Management Plan and Scheduling Order.

Pursuant to the Court's direction the parties hereby propose the following briefing schedule should the matter not be resolved.

- Plaintiffs motion for summary judgment will be due on or before April 5, 2024;
- Defendant's opposition will be due on or before May 6, 2024;
- Plaintiff's reply is due May 29, 2024.

The parties thank the Court for considering this submission.

Respectfully submitted,

/s/ Vivian Rivera Drohan  
Vivian Rivera Drohan, Esq.

cc: Irina Roller, Esq. (via ECF)

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